To: Mike Dundas[mike.dundas@lacity.org]

Cc: Strefan Fauble[strefan.fauble@lacity.org]; Jeanne Min[jeanne.min@lacity.org]

From: Dan Halden

Sent: Mon 4/22/2019 4:37:01 PM

Subject: Re: CPRA request (CD13.2019.03.12.a)

Mike, can you please draft a response for me to respond to Adrian? Thank you.



Dan Halden

Director, HEART of Hollywood Office of Councilmember Mitch O'Farrell, 13th District (213) 473-2187 | <u>daniel.halden@lacity.org</u> | <u>www.cd13.com</u>

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On Tue, Apr 16, 2019 at 9:24 AM Dan Halden < <u>Daniel.Halden@lacity.org</u>> wrote:

OK... printing out all the emails, then going through to see if there are exemptions, then redacting where appropriate, will take weeks or months. For comparison, we did produce an 800-page request for "Qwerty" and that took about 3-4 months. Can you advise on an appropriately crafted response to Adrian?



Dan Halden

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On Tue, Apr 16, 2019 at 9:18 AM Mike Dundas < mike.dundas@lacity.org > wrote:

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Riskin or not, I don't think any writ judge down the street would think 600 documents was too many to redact, unless the redactions completely consume the readability of the records themselves. Without knowing what is in these records, it would be my advice to remove the exempt records, then redact and produce the rest, unless there wouldn't be any content left after redacting all of the confidential information. The balancing test is best applied to "burdensome" requests when the search would waste time searching for a needle in a haystack or when there are thousands of records that may be of scant value to the public.

As to whether Riskin would sue, I don't know. I am not even sure he knows at this time.

Mike

On Tue, Apr 16, 2019 at 8:57 AM Strefan Fauble < strefan.fauble@lacity.org > wrote:

Let's pull Dundas into this disucssion since he has dealt with Adrian most. Mike, read down the email chain. Adrian's request--which, his argument to the contrary, seems to lack a subject matter--would require Dan to go through about 600 emails. Many of the emails would be exempt, I expect, and many would require lots of redaction. I think under the

balancing test that it's clearly not in the public interest to have Dan dedicate the time needed to review and redact the 600 emails just so Adrian can see the kinds of conversations Dan has with the officers at issue. What do you think-considering also your judgment about whether Adrian would sue (which would involve a lot more work)?

On Fri, Apr 12, 2019 at 11:09 AM Dan Halden < <u>Daniel.Halden@lacity.org</u>> wrote:

Hi Strefan,

Please see below for Adrian's response and advise if/how I should respond.

Thanks!



Dan Halden
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